



September 13, 2023

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VIA EMAIL: [sccsafemeds@cep.sccgov.org](mailto:sccsafemeds@cep.sccgov.org)

**Subject: BACWA Comments on MED-Project Stewardship Plan for Unwanted Medicine**

Dear Edgar Nolasco:

On behalf of the Bay Area Clean Water Agencies (BACWA), we thank you for the opportunity to provide comments on MED-Project's "[Product Stewardship Plan for Unwanted Medicine from Households](#)" (Plan<sup>1</sup>) for Santa Clara County. BACWA's members include 55 publicly-owned wastewater treatment facilities and collection system agencies serving 7.1 million San Francisco Bay Area residents. Every day, BACWA members collect and treat millions of gallons of pharmaceutical-containing wastewater that is discharged to local creeks and rivers, bays, and the Pacific Ocean. We take seriously our responsibilities for safeguarding these receiving waters.

Many pet medicines are the same or similar to human medicines, carrying the same well-documented water quality and public health risks. Pet medicines also pose a unique disposal risk because many pet medications are pesticides that are toxic to aquatic life (e.g., flea and tick control products). As these medicines and pesticides pass through wastewater facilities and enter downstream waterways, they often accumulate and create water quality concerns and risks to the San Francisco Estuary ecosystems. People all around Santa Clara County and the Bay Area use pet medicines and pesticides -- meaning there is a significant risk to environmental and public health posed by these chemicals. Addressing human medicines but not fully addressing pet medicines allows these risks to continue.

After reviewing the Plan, we are disappointed to find no specific public outreach components related to covered drugs for pets. Covered drugs are not only required to be accepted by the Santa Clara County Safe Drug Disposal Ordinance (Ordinance), but outreach and education are

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<sup>1</sup> *MED-Project: A Product Stewardship Plan for Unwanted Medicine from Households*. Santa Clara County, California. July 29, 2023. Available online at [https://hhw.sccgov.org/sites/g/files/exjcpb1136/files/documents/ERM\\_CSC\\_MED-Project\\_Unwanted\\_Medicine\\_Updated\\_Plan\\_v0\\_20230729.pdf](https://hhw.sccgov.org/sites/g/files/exjcpb1136/files/documents/ERM_CSC_MED-Project_Unwanted_Medicine_Updated_Plan_v0_20230729.pdf)

required to promote the program and its components to all residents. Since the Ordinance stipulates that “drugs” includes medicines used by residents for “humans and other animals,” we believe the Plan needs to expand its messaging and outreach related to pet medicines to address the risks to water quality and public health that pet medicines carry.

Outreach and messaging by the MED-Project in the past have been specific and clear about what is accepted or not accepted in the safe medicine disposal program, including calling out specific types and forms of medicines. We believe this is a core reason why this program has been successful and is a necessary way to make the program understandable and accessible to all residents, as required by Sec B11-547 (b) of the Ordinance (No. NS-517.91). Failing to mention pet medicines explicitly in messaging and on collateral creates confusion about whether pet medicines are accepted. Explicit language related to pet medicines is needed to ensure all residents know that pet medicines are accepted by this program.

Since locations without a licensed pharmacist – such as vet offices and stores that sell pet medicines and pesticides – are not allowed to have drug takeback bins, outreach for these locations is limited to education and distribution of collateral and mail-back envelopes. Table 7 of Appendix C in the [MED-Project 2021-22 Annual Report](#)<sup>2</sup> shows that zero mail-in envelopes (standard or inhaler) were distributed to the animal related locations during the 2021-22 program year, suggesting that this is a seldom used route by residents. The “Participating Mail-Back Distribution Sites” table in Appendix C of the Plan shows only two stores or offices that serve pet owners specifically.

The Plan and previous years’ actions show that the MED-Project has a good starting model to address the risks present in human medicines. We feel, however, because of the significant risk to the environment and public health that pet medicines pose, properly addressing those risks warrants targeted action, messaging, and education. As shown by the lack of usage of veterinary mail-back locations and the absence of any explicit language related to pet medicine acceptance, the previous outreach efforts by MED-Project have not been enough to promote this portion of the program and educate all residents. The Plan appears to be much of the same and is clearly not sufficient in this regard. MED-Project must increase its outreach to reduce the risks of pet medicines on environmental and public health alike.

We are asking MED-Project to be required to increase public outreach related to pet medicine and outreach to veterinarians, veterinary offices, and pet-specific locations. We believe this can be done by:

- Including explicit language related to pet medicine acceptance to the “What Can I Dispose Of?” page of the MED-Project website, physical collateral, social media posts, and digital campaign messaging.

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<sup>2</sup> *MED-Project 2021-2022 Annual Report to County of Santa Clara (Unwanted Medicine)*. April 10, 2023. Available online at [https://hfw.sccgov.org/sites/g/files/exjcpb1136/files/documents/20230413-ERM\\_CSC\\_Unwanted-Med-Annual-Report-revised-final.pdf](https://hfw.sccgov.org/sites/g/files/exjcpb1136/files/documents/20230413-ERM_CSC_Unwanted-Med-Annual-Report-revised-final.pdf)

- Creating physical signage in the required languages that includes the explicit language of proper pet medicine disposal at takeback bins.
- Increasing the number of veterinary offices or pet-specific locations with physical signage in the required languages promoting mail-back services.
- Increasing the number of veterinarians, veterinary offices, and pet-specific locations partnering with MED-Project to distribute mail-in envelopes.
- Increasing outreach and education to veterinarians, veterinary offices, and pet-specific locations to promote that pet medicines are also accepted alongside human pharmaceuticals at take-back bins and to promote the safe pharmaceutical disposal program's mail-back service.

Thank you for your consideration of our comments. If you have any questions, please contact BACWA's Project Managers:

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Respectfully Submitted,

A handwritten signature in blue ink that reads "Lorien Fono". The signature is fluid and cursive, with a long horizontal stroke at the end.

Lorien Fono, Ph.D., P.E.  
Executive Director  
Bay Area Clean Water Agencies

cc: Safe Drugs Disposal Liaison, County of Santa Clara  
BACWA Executive Board  
BACWA Pesticides Workgroup